

SEP 29, 2005 06:46 Dotan Saguy

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OCT 03 2005

App. No. 10/063,108

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

Applicant : Dotan Saguy  
Appl. No. : 10/063,108  
Filed : 03/21/2002  
Title : System for Multiple Signers on an Electronic Card and Gift  
Grp./A.U. : 3622  
Examiner : Daniel Lastra

Honorable Commissioner of for Patents  
Washington, D.C. 20231

**DECLARATION UNDER 37 C.F.R. Section 1.132**

I, Dotan Saguy, declare and say:

That I am a citizen of France and I reside at 2346 Prosser Av., Los Angeles CA 90064;

That I am the applicant in the above-identified patent application;

That I am currently the CEO and Founder Blue Lava Group Inc. That I have achieved my position as a product and technology innovator in the world of online marketing by integrating broad experiences from leading IT consulting firms (Accenture, Cambridge Technology Partners & CAP Gemini) and market leaders in the industry (Overture Services, AGENCY.COM, WebMiner and iAnswers.com).

Prior to founding Blue Lava Group in 2003, I was Director of Product Management at Overture/Yahoo! and led the development of its marketing analytics suite. I previously held positions of Chief Technology Officer at WebMiner (now Exemplar who is a leader in online brand personalization) in the performance marketing and web analytics space, Senior Project Manager at Cambridge Technology Partners (now Novell) and at AGENCY.COM where I managed multi-million dollar projects for companies such as Sony and IBM. I honed my process management and technology skills as a Senior Process Consultant at Andersen Consulting (now Accenture) working on large process re-engineering projects for AT&T, and as a Programmer at Cap Gemini/Ernst & Young. I hold a Master's and Bachelor's in Computer Science from EPITA, Paris, France.

That I am familiar with the above-identified patent application Serial No. 10/063,108 and the following references cited by the Examiner: the Bansai patent, U.S. Patent number 6,804,805, the Nelsen patent application, U.S. Patent Application No. 2002/0042775, the Ganesan patent application, U.S. Patent Application No. 2002/0087427, and the Lomangino Patent Application, U.S. Patent Application 2002/0052756.

We have received offers to purchase the patent application from eGroupCard (EGC) at [www.egrouppcard.com](http://www.egrouppcard.com) so they can purpose and use the process in commerce.

We have licensed the current invention to Studiocom, Inc. for exclusion use of the patent pending process for the marketing of Diet Coke for the Coca-Cola Company on the website [Http://www.dietcoke.com](http://www.dietcoke.com).

We respectfully counter that the use of the System for Multiple Signers on an Electronic Card and Gift is nonobvious and is unique to the applicant. None of the other inventions and patent applications, comprise all of the elements of the present invention, which is an improvement in the art. We counter that the invention is nonobvious because it has proved extremely marketable; therefore if it had been obvious, the present invention would have been previously

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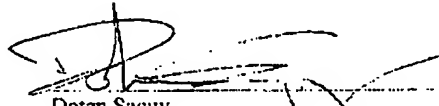
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put into operation by others in the business in order to profit from it. Since the applicant has just recently developed it and no one else has been able to replicate it, the present invention must be nonobvious.

Further declarant saith not.

Date September 27, 2005

  
Dotan Saguy